



March 1, 2016

Via Overnight Delivery

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

**Re: Annual CPNI Compliance Certification, EB Docket No. 06-36**

Dear Secretary Dortch:

Attached for filing in EB Docket No. 06-36, please find the Annual 47 C.F.R. § 64.20091 CPNI Compliance Certification and accompanying statement of the entities immediately listed in the chart below (collectively "Lightower,") and their respective filer IDs:

Lightower Fiber Networks I, LLC (formerly known as Light Tower Fiber Long Island LLC)	824812
Lightower Fiber Networks II, LLC (formerly known as Sidera Networks, LLC)	822434
Fiber Technologies Networks, L.L.C.	821688

If there are any questions regarding this filing, please contact the undersigned.  
Thank you for your assistance.

Sincerely,

  
Fernanda H. Biehl  
Senior Director, Regulatory Affairs

cc: David L. Mayer  
General Counsel, EVP & Secretary  
Lightower Fiber Networks



**Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification**

**EB Docket No. 06-36**

Annual 64.2009(e) CPNI Certification for 2014

Date filed: March 1, 2016

Certifying Companies with Form 499 Filer IDs:

Lighttower Fiber Networks I, LLC (formerly known as Light Tower Fiber Long Island LLC)	824812
Lighttower Fiber Networks II, LLC (formerly known as Sidera Networks, LLC)	822434
Fiber Technologies Networks, L.L.C.	821688

Name of signatory: David L. Mayer

Title of signatory: General Counsel, EVP Business Development & Secretary

I, David L. Mayer, certify that I am an officer of Lighttower Fiber Networks I, LLC (formerly known as Light Tower Fiber Long Island LLC), Lighttower Fiber Networks II, LLC (formerly known as Sidera Networks, LLC), and Fiber Technologies Networks, L.L.C. (collectively "Lighttower"), and acting as an agent of the Lighttower, that I have personal knowledge that Lighttower has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how Lighttower's procedures ensure that Lighttower is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Lighttower has not taken any actions (proceedings instituted or petitions filed by Lighttower at either state commissions, the court system, or at the Commission) against data brokers in the past year. Lighttower has no information to report with respect to the processes pretexters are using to attempt to access CPNI. Lighttower's steps taken to protect CPNI are described in the accompanying statement.

Further, Lighttower has not received any customer complaints concerning the unauthorized release of CPNI in its operations in the past year.

Signed: Lighttower Fiber Networks I, LLC  
Lighttower Fiber Networks II, LLC  
Fiber Technologies Networks, L.L.C.

By: 

David L. Mayer, General Counsel, EVP Business Development & Secretary



**Certificate to Accompany Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket No. 06-36**

Lightower submits this accompanying statement to provide an overview on how our procedures ensure that Lightower is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

**1. Compliance with Section 64.2007, approval required for use of customer proprietary network information:**

Lightower provides custom, high-capacity network services to enterprise, government, carrier, and data center customers. As a matter of customer convenience, Lightower uses commercially reasonable processes (e.g., account number, billing address, contact name, and identification of services) to authenticate customer representatives that contact Lightower to request CPNI. Lightower recognizes that under federal law it has a duty to protect CPNI and customers have a right to such protection.

**2. Compliance with Section 64.2008, notice required for use of customer proprietary network information:**

Lightower did not share, sell, lease, or otherwise provide CPNI to affiliates, agents, independent contractors, or joint ventures for purposes of marketing any services to existing customers within the period covered by this annual certification and accompanying statement.

Lightower recognizes that under federal law it has a duty to protect CPNI and customers have a right to such protection. Marketing campaign records using CPNI after obtaining appropriate customer approval would be maintained for a minimum of one (1) year.

**3. Compliance with Section 64.2009, safeguards required for use of customer proprietary network information:**

Lightower personnel are trained regarding Lightower's CPNI policies. Lightower has a disciplinary process for non-compliance with Lightower's CPNI policies. Lightower did not share, sell, lease, or otherwise provide CPNI to affiliates, agents, independent contractors, or joint ventures for purposes of marketing any services to existing customers within the period covered by this annual certification and accompanying statement.

**4. Compliance with Section 64.2010, safeguards on the disclosure of customer proprietary network information:**

Lightower has measures in place to discover and protect against attempts to gain unauthorized access to CPNI. Lightower uses commercially reasonable processes (e.g., account number, billing address, contact name, and identification of services) to authenticate customer representatives that contact Lightower to request CPNI.





**5. Compliance with Section 64.2011, notification of customer proprietary network information security breaches:**

Lighttower has not experienced any CPNI breaches in its operations during the reporting year. However, Lighttower has in place procedures to detect breaches and to notify law enforcement and customers, in compliance with the Commission's rules, should a breach occur. In the event of a breach, Lighttower has procedures in place to maintain a record of notifications to law enforcement and customers documenting the date(s) of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach, which record would be kept for a minimum of two (2) years.